

WEIL, GOTSHAL & MANGES LLP
Theodore E. Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

KELLER DENVER CITY
Tobias S. Keller (#151445)

Tobias S. Keller (tkeller@kbkllp.com)

Peter J. Benvenutti (#60566)

(pbenvenuti@kbkllp

Jane Kim (#298192)

(jkim@kbkllp.com)

650 California Street, Suite

San Francisco, CA 94103
T: 1 (415) 426-6722

Tel: (415) 496-6723
Fax: (650) 626-0251

Fax: (650) 636 9251

*Attorneys for Debtors and Reorganized
Debtors*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

| Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION CONTINUING
HEARING ON MOTION OF THE
YUROK TRIBE FOR
RECONSIDERATION OF THE ORDER
DISALLOWING AND EXPUNGING
PROOFS OF CLAIM PURSUANT TO
REORGANIZED DEBTORS' FIFTY-
THIRD OMNIBUS OBJECTION TO
CLAIMS (NO LIABILITY
SUBCONTRACTOR CLAIMS)**

Related to Dkt. Nos. 10238, 10239

Current Hearing Date: March 24, 2021
New Hearing Date: April 28, 2021

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
2 debtors and reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the Plan,¹
3 the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand,
4 and the Yurok Tribe (together with the Debtors and Reorganized Debtors, the “**Parties**”), on the other
5 hand, by and through their respective counsel, hereby stipulate and agree as follows:

6 **RECITALS**

7 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11
8 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy**
9 **Court**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant
10 to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

11 B. On February 19, 2021, the Yurok Tribe filed the *Motion of the Yurok Tribe for*
12 *Reconsideration of the Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized*
13 *Debtors’ Fifty-Third Omnibus Objection to Claims (No Liability Subcontractor Claims)* [Docket No.
14 10238] (the “**Motion**”), in which it requested that the Bankruptcy Court reconsider the *Order*
15 *Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors’ Fifth-Third Omnibus*
16 *Objection to Claims (No Liability Subcontractor Claims)* [Docket No. 10104], entered on February 5,
17 2021, with respect to the disallowance and expungement of the Yurok Tribe’s Claim No. 55953. The
18 hearing on the Motion (the “**Hearing**”) currently is scheduled for March 24, 2021 at 10:00 a.m. Pacific
19 Time.

20 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
21 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
22 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT
TO ORDER, THAT:

23 1. The Hearing shall be continued to April 28, 2021 at 10:00 a.m. (Pacific Time).

24 2. The time for the Reorganized Debtors to submit any response to the Motion shall be
25 extended to April 14, 2021.

26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the
27 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020*
28 (as may be further modified, amended or supplemented from time to time, and together with any
exhibits or scheduled thereto, the “**Plan**”).

1 3. This Stipulation may be executed in counterparts, each of which shall be deemed an
2 original but all of which together shall constitute one and the same agreement.

3 4. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
4 arising from this Stipulation or any Order approving the terms of this Stipulation.

5
6 Dated: March 10, 2021

Dated: March 10, 2021

7 **WEIL, GOTSHAL & MANGES LLP**
8 **KELLER BENVENUTTI KIM LLP**

HOGAN LOVELLS US LLP

9 /s/ Dara L. Silveira

Dara L. Silveira

/s/ Erin N. Brady

Erin N. Brady

10 *Attorneys for Debtors*
11 *and Reorganized Debtors*

Attorneys for the Yurok Tribe

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28